



Jacqueline M. Arango

Application GRANTED. The Clerk of Court is directed to terminate Doc. #508.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Jacqueline M. Arango".

May 29, 2025

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**VIA CM/ECF**

Honorable Jesse M. Furman, District Judge  
United States District Court, Southern District of New York  
Thurgood Marshall, United States Courthouse  
40 Foley Square  
New York, NY 10007

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**Re: USA v. Winkelbauer, et al., USDC, Southern District of New York  
Case No. 23-cr-133-JMF**

Dear Judge Furman:

We represent Fabiola Cino in the above-referenced matter. We respectfully request a change of Ms. Cino's bond conditions to include travel to Lima, Peru from July 1 - 21, 2025 to attend to her parents whom are both in their late 80s and in poor health. Her mother has been suffering from Alzheimer's for several years now and her condition is deteriorating. Ms. Cino's father will be turning 90 years old and she would also like to be with him for his birthday. As part of the bond modification, Ms. Cino would need her U.S. Passport to be returned to her temporarily by Pre-Trial Services prior to her trip. Upon her return from Lima, Peru, she will surrender her passport back to Pre-Trial Services.

Ms. Cino's travel is restricted to the Eastern and Western Districts of Virginia, Southern District of Florida, District of Maryland, District of Columbia and New York. Accordingly, we respectfully request that Ms. Cino's bond be modified to include Lima, Peru to the list of locations where Ms. Cino is permitted to travel for this trip.

We have conferred with AUSA Danielle Kudla and Pre-Trial Services Officer Michelle Suleiman, who are copied here, and they have confirmed that they have no objection to this request. We will provide the AUSAs on this matter with Ms. Cino's travel itinerary, the address of where she will stay in Lima, Peru, and any other trip information that is requested.

Sincerely,

/s/ Jacqueline M. Arango  
Jacqueline M. Arango

cc: [Danielle.Kudla@usdoj.gov](mailto:Danielle.Kudla@usdoj.gov)  
[Michelle\\_Suleiman@vaep.uscourts.gov](mailto:Michelle_Suleiman@vaep.uscourts.gov)